## MATTHEW J. KLUGER ATTORNEY AT LAW

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February 13, 2020

The Honorable Loretta A. Preska United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007 USDC SDAY
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Re: <u>United States v. Temitope Omotayo</u> 19 Cr. 291 (LAP)

Dear Judge Preska:

I am the attorney assigned to represent Mr. Omotayo pursuant to the Criminal Justice Act. I write now seeking a modification of the defendant's bail.

Bail in this matter was set on April 25, 2019 (Pitman, MJ). As a condition of his bail, Mr. Omotayo's travel is restricted to the Southern, Eastern, and Northern Districts of New York. Mr. Omotayo seeks the Court's permission to visit with family in Indianapolis from February 16, 2020 to February 25, 2020. Should permission be granted, the defense will provide Pretrial with the necessary contact and address information.

AUSA Daniel Wolf and Pretrial Services Officer Courtney DeFeo take *no position* and leave the matter to the Court's discretion.

Thank you for the Court's consideration

Respectfully,

/s/ Matthew J. Kluger
Matthew J. Kluger

cc:

AUSA Daniel Wolf

Pretrial Services Officer Courtney DeFeo

LORETTA A. PRESKA UNITED STATES DISTRICT JUDGE